

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

| | | |
|--------------------------|---|--------------------|
| UNITED STATES OF AMERICA | § | |
| | § | |
| v. | § | No. 1:23-CR-10 |
| | § | Judge Marcia Crone |
| AHMED ABDALLA ALLAM | § | |

ELEMENTS OF THE OFFENSE

You are charged in Count One of the Indictment with a violation of 18 U.S.C. § 922(q)(2)(A), possession of a firearm in a school zone.

The essential elements which must be proven, beyond a reasonable doubt, to establish the 18 U.S.C. § 922(q)(2)(A) violation are:

1. That the defendant knowingly possessed a firearm, as charged;
2. That the defendant's possession of the firearm occurred within a distance of 1,000 feet of the grounds of a school, a place that the defendant had reasonable cause to believe was a school zone;
3. That the firearm possessed travelled in interstate commerce; that is, before the defendant possessed the firearm, it had travelled at some time from one state to another.

Respectfully submitted,

DAMIEN M. DIGGS
UNITED STATES ATTORNEY

/s/ John B. Ross

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CERTIFICATE OF SERVICE

This is to certify that on the date of its electronic filing, a true and correct copy of the foregoing instrument was served on the attorney for defendant, by electronic means, pursuant to the Local Rules of this Court.

/s/ John B. Ross

John B. Ross

Assistant United States Attorney